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THE REBENS DORF GROUP, INC.

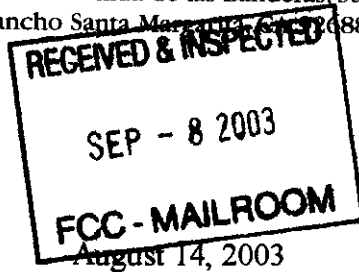
• MANAGEMENT CONSULTING • INVESTMENT BANKING • REGULATORY COMPLIANCE •

30211 Avenida de las Banderas, Suite 200
Rancho Santa Margarita, CA 92688

Phone (949) 766-6710

Fax: (949) 766-6711

E-mail: mail@rebensdorf.com



VIA CERTIFIED MAIL

Marlene H Dortch
Secretary
Federal Communications Commission
Office of the Secretary
c/o Vistrionix, Inc
Suite 110
Washington, DC 20002

Re CC Docket No. 94-129, Certification of Exemption from "Drop-Off"
Requirement

Dear Ms Dortch

Legent Communications Corporation, d/b/a Long Distance Services ("Legent"), by its undersigned counsel, hereby certifies that it qualifies for an exemption from the "drop-off" requirement set forth in 47 C F R. 64.1120.

In its recent decision in CC Docket No. 94-129, the Commission established a new mechanism by which carriers' certifying as to their inability to comply with the "drop-off" rule will be exempt from that rule for a two year period. See Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996; Policies and Rules Concerning Unauthorized Changes of Consumers' Long Distance Carriers, CC Docket No. 94-129, Third Order on Reconsideration and Second Notice of Proposed Rulemaking, 68 Fed Reg 19152 & 19176 (rel March 17, 2003).

Please be advised that the telemarketing companies utilized by Legent lack the technical capabilities to comply with the FCC's "drop-off" rule. Specifically, the technologies used by Legent's telemarketing providers do not allow the person initiating the call to "drop-off" the line without also disconnecting the three-way call. Upgrading to systems that would allow Legent's telemarketers to "drop-off" once a three-way call is initiated would be prohibitively expensive for a company of Legent's size, and for its telemarketers

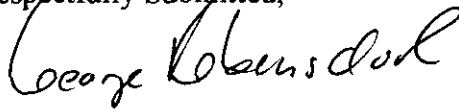
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Marlene H Dortch
August 14, 2003
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A certification signed by Scott White, President of Legent, made in support of these statements under Section 1 16 of the Commission's rules, is enclosed herewith

Questions regarding this certification should be addressed to the undersigned.

Respectfully Submitted,

A handwritten signature in cursive script, reading "George Rebersdorf".

George Rebersdorf
The Rebersdorf Group, Inc
Counsel for Legent Communications Corporation

Cc Nancy Stevenson, Federal Communications Commission

CERTIFICATION

I, Scott White, certify that I am President of Legent Communications Corporation, d/b/a/ Long Distance Services ("Legent"), and that I am authorized to make this certification for Legent. Further, I certify that Legent is unable to comply with the "drop-off" requirement as set forth in 47 C.F.R. Section 64.1120. Specifically, the technology used by Legent's telemarketing providers does not allow the telemarketer initiating a three-way call to "drop-off" the line without disconnecting the three-way call. Upgrading to systems that would allow Legent's telemarketers to do so would be prohibitively expensive for a company of Legent's size. I hereby certify that to the best of my knowledge and belief, under penalty of perjury, the foregoing statements are true and correct.

Executed on August 5, 2003

A handwritten signature in black ink, appearing to read 'Scott White', is written over a horizontal line.

Scott White

President

Legent Communications Corporation, d/b/a Long Distance Services